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March 6, 2012

Honorable Harold A. Baer, Jr.
United States District Judge
500 Pearl Street
New York, New York 10007-1312

Re: United States v. Carollo, et al., 10 Cr. 654 (HB)

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Dear Judge Baer,

We represent defendant Steven E. Goldberg in the above matter. We have served two subpoenas *duces tecum* on government witness Dani Naeh, one dated February 10, 2012 and one dated March 1, 2012. On February 22, 2012, before we served our second subpoena, Susan Hoffinger, Esq., counsel for Mr. Naeh, filed a motion to quash the February 10 subpoena. The response to that motion to quash is currently due by March 8.

We have spoken with Ms. Hoffinger, and she has indicated that she will likely file a motion to quash the March 1 subpoena, and can do so by March 9. To simplify matters for the Court, she has agreed to allow us to file a consolidated response to both motions to quash by March 16. Ms. Hoffinger will be unavailable between March 20 and March 28. We therefore respectfully request that the Court adjourn the date of Mr. Goldberg's response to the motion to quash the February 10 subpoena from March 8 to March 16, and to permit Mr. Goldberg to file a consolidated response to all of Mr. Naeh's motions to quash on that date.

Respectfully submitted,

Daniel M. Gitner

cc: Susan Hoffinger, Esq.

SO ORDERED:

Harold Baer, Jr., U.S.D.J.

3/7/12

Endorsement:

The above schedule is OK with me.